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DEPARTMENT OF FISH AND WILDLIFE  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



July 10, 2024

Dana Morrison  
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Subject: Napa County Airport Land Use Combability Plan (ALUCP) Update, Initial Study/Negative Declaration, SCH No. 2024060773, Napa County

Dear Ms. Morrison,

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Negative Declaration (IS/ND) from Napa County (County) for the Napa County Airport Land Use Combability Plan (ALUCP) Update (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

CDFW is submitting comments on the IS/ND to inform the County, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

## **CDFW ROLE**

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** Napa County

**Objective:** The Project is an update to the Napa Countywide (County) Airport Land Use Compatibility Plan (ALUCP) applies to lands around the two public-use airports in the county: the Angwin Airport (Parrett Field) and the Napa County Airport.

The purpose of the ALUCP is "to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses." The intent of the ALUCP is to discourage the expansion or introduction of incompatible land uses within an airport's area of influence. ALUCPs are reviewed to ensure

Dana Morrison  
Napa County  
July 10, 2024  
Page 2

consistency with existing general plans, specific plans, zoning ordinances, building regulations, and certain individual development actions of local agencies.

**Location:** The Project applies to two airports in Napa County and the parcels covered by the Airport Influence Area (AIA). Angwin Airport-Parrett Field is located at 1 Airport Way, Angwin, CA 94508; APN 024-080-048-000, and at approximately 38.57262°N and -122.43447°W. Napa County Airport is located at 2000 Airport Road, Napa, CA 94558; APN 057-050-009-000, and at approximately 38.21312°N and -122.28017°W.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. As the Project impacts to biological resources are unclear as outlined in the below comments, CDFW is uncertain if an IS/ND is appropriate for the Project.

### **COMMENT 1: Potentially Significant Impacts to Sensitive Fish and Wildlife Species and their Habitats**

#### Napa-Sonoma Marshes Wildlife Area and Fagan Slough Ecological Reserve

It is unclear if the Project has the potential to impact sensitive biological resources associated with CDFW's Napa-Sonoma Marshes Wildlife Area and Fagan Slough Ecological Reserve/California Marine Protected Area (CDFW Properties), located directly adjacent to the Napa County Airport, for the reasons outlined in the following paragraph. CDFW Properties contains habitat for several Fully Protected, CESA listed, and California Rare Plant Rank 1B.2 species including California Ridgway's rail (*Rallus obsoletus obsoletus*), California black rail (*Laterallus jamaicensis coturniculus*), saltmarsh harvest mouse (*Reithrodontomys raviventris*), and Suisun marsh aster (*Symphotrichum lentum*). According to Figure 4A (page 63) of the IS/ND, CDFW Properties are included in the Draft Airport Influence Area (AIA) boundary.

The IS/ND (pages 27-28) states that "The Draft ALUCP does not impact existing land uses, nor does the document include physical activities that would directly impact the AIA environment. Thus, the Draft ALUCP does not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service." On the other hand, the IS/ND states that "...the Draft ALUCP may indirectly affect future land development within the AIA of each airport. Specifically, wildlife hazard policies (Policy 3.5.3) of the Draft ALUCP restrict land uses that attract wildlife within Draft Zone A, including the creation of wetland mitigation sites, conservation areas, and wildlife preserves. This policy also recommends the avoidance of these land uses in the wildlife

Dana Morrison  
Napa County  
July 10, 2024  
Page 3

critical zone”, and “Local general plans, specific plans, and zoning ordinances must be consistent with an adopted ALUCP (unless the local jurisdiction overrides the ALUCP as described in Section 1.4). Thus, inconsistency between the adopted ALUCP and current land use plans could result in displacement of planned land uses, including planned habitat and wildlife areas.” Based on the above information, it appears that the ALUCP requirements may supersede or otherwise impact existing land use designations thereby putting CDFW’s Properties, including Fully Protected and CESA listed species, at risk.

### Napa Plant Site Restoration Project

The IS/ND does not evaluate how the adopted ALUCP may affect CDFW’s existing Napa-Sonoma Marshes Wildlife Area Land Management Plan and associated Napa Plant Site Restoration Project success criteria and goals.

### Runway Safety Area Tidal Wetlands and Sea Level Rise

During the Napa Plant Site Restoration Project planning, CDFW worked with the Federal Aviation Administration, California Department of Transportation Aeronautics, and Napa County Airport and agreed to leave 8.86 acres of CDFW land out of the restoration project, knowing the Napa County Airport will eventually need to extend its Runway Safety Area (RSA). Since 2008, the RSA has subsided and reverted to muted tidal wetlands and is known to support salt marsh harvest mouse (*Reithrodontomys raviventris*) and Suisun Marsh aster. Additionally, the ALUCP does not address the potential issues of climate change and sea level rise. “No name creek” was overtopping in the mid to late 2000’s causing flooding issues and Fagan Creek has been known to overtop. Has the ALUCP used climate change projections to anticipate increased flooding issues? It seems that the above issues could affect future airport use/expansion, which could in turn result in impacts to CDFW Properties and sensitive biological resources.

**Recommendations:** The Project’s Initial Study should include the following information:

- Clarify if there will be any land use impacts to CDFW’s Properties including, but not limited to, if the ALUCP could supersede CDFW Properties’ land uses and describe any potential impacts to CDFW’s Properties and any other sensitive biological resources within the AIA of both airports;
- Evaluate how the adopted ALUCP may affect CDFW’s existing Napa-Sonoma Marshes Wildlife Area Land Management Plan and associated Napa Plant Site Restoration Project success criteria and goals;
- Evaluate how the future RSA and climate change and associated sea level rise could affect future airport use/expansion, and in turn result in impacts to CDFW Properties and sensitive biological resources; and

Dana Morrison  
Napa County  
July 10, 2024  
Page 4

- Include mitigation measures to reduce any impacts to CDFW Properties or sensitive biological resources to less-than-significant, such as modifications to land uses or direct or indirect impacts to special-status species or their habitats. CDFW requests that the County coordinate with CDFW to develop appropriate mitigation measures if such impacts are anticipated.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

## CONCLUSION

CDFW appreciates the opportunity to comment on the IS/ND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nicholas Magnuson, Environmental Scientist, at (707) 815-4166 or [Nicholas.Magnuson@wildlife.ca.gov](mailto:Nicholas.Magnuson@wildlife.ca.gov); or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov).

Sincerely,

DocuSigned by:

*Erin Chappell*

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Regional Manager  
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Dana Morrison  
Napa County  
July 10, 2024  
Page 5

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